

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:

APPLICATION OF INTERNATIONAL MINERAL  
RESOURCES B.V. FOR AN ORDER TO TAKE  
DISCOVERY PURSUANT TO 28 U.S.C. § 1782

Applicant.

Case No. 1:15-mc-00241

**DECLARATION OF REBECCA G. MANGOLD**

Pursuant to 28 U.S.C. § 1746, I, Rebecca G. Mangold, declare under penalty of perjury as follows:

1. I am an attorney licensed to practice in the State of New York and before this Court. I am an associate at the law firm Kobre & Kim LLP, counsel for International Mineral Resources B.V. ("IMR").

2. I submit this Declaration in support of IMR's Opposition to the Motion to Quash and the Request for Pre-Hearing Discovery filed by respondent Patrick Salisbury and intervenor EuroChem Volga-Kaliy LLC.

3. Attached hereto as Exhibit A is a true and correct copy of the August 19, 2015 Memorandum Opinion entered by the United States District Court for the District of Columbia ("D.D.C.") in *In re Application of International Mineral Resources B.V. For An Order To Take Discovery Pursuant to 28 U.S.C. § 1782* ("*In re IMR*"), No. 14-mc-00340 (ECF No. 49).

4. Attached hereto as Exhibit B is a true and correct copy of the November 18, 2015 Memorandum Order regarding Rule 11(b) entered by the D.D.C. in *In re IMR*, No. 14-mc-00340 (ECF No. 61).

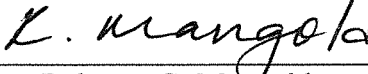
5. Attached hereto as Exhibit C is a true and correct copy of the November 18, 2015 Memorandum Order regarding the respondent's Motion to Recover Costs entered by the D.D.C. in *In re IMR*, No. 14-mc-00340 ((ECF No. 60).

6. Attached hereto as Exhibit D is a revised subpoena seeking the production of documents and testimony from Mr. Salisbury.

7. Attached hereto as Exhibit E is a true and correct copy of an October 1, 2015 letter from Gary Pritchard to Jonathan Cogan regarding Shaft Sinkers (Pty) Ltd.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York, on this 7<sup>th</sup> day of December, 2015.

  
Rebecca G. Mangold